
UNITED STATES DISTRICT COURT
DISTRICT OF NEW JERSEY

UNITED STATES OF AMERICA : Mag. No. 15-3162
v. : Hon. James B. Clark, III
JONATHAN SOTO : **CRIMINAL COMPLAINT**


I, Kevin P. Matthews, being duly sworn, state that the following is true and correct to the best of my knowledge and belief:

SEE ATTACHMENT A

I further state that I am a Special Agent with the Federal Bureau of Investigation and that this Complaint is based on the following facts:

SEE ATTACHMENT B

continued on the attached page and made a part hereof.


Kevin P. Matthews, Special Agent
Federal Bureau of Investigation

Sworn to before me and subscribed in my presence,
on April 16, 2015, at Newark, New Jersey


HONORABLE JAMES B. CLARK, III
UNITED STATES MAGISTRATE JUDGE

ATTACHMENT A

COUNT ONE

From in about July 2014 through on or about April 14, 2015, in Somerset County, in the District of New Jersey, and elsewhere, defendant

JONATHAN SOTO

knowingly made, printed and published, and caused to be made, printed and published, any notice and advertisement seeking and offering to receive, exchange, buy, produce, display, distribute, and reproduce a visual depiction of a minor engaging in sexually explicit conduct, and which depiction was of such conduct and such notice and advertisement were transported using any means and faculty of interstate and foreign commerce and affected interstate and foreign commerce by any means, including by computer.

All in violation of Title 18, United States Code, Section 2251(d)(1)(A), and Title 18, United States Code, Section 2.

ATTACHMENT B

I, Kevin P. Matthews, am a Special Agent with the Federal Bureau of Investigation ("FBI"). I have knowledge of the following facts based upon both my investigation and discussions with other law enforcement personnel and others. Because this affidavit is being submitted for the sole purpose of establishing probable cause to support the issuance of a Complaint, I have not included each and every fact known to the Government concerning this matter. Where statements of others are set forth herein, these statements are related in substance and in part. Where I assert that an event took place on a particular date, I am asserting that it took place on or about the date alleged.

Background

1. At all times relevant to this Complaint, defendant JONATHAN SOTO ("SOTO") was a resident of Branchburg, New Jersey.

The Investigation

2. The FBI has been investigating a group of individuals who operated two similar websites, WEBSITE A and WEBSITE B, which were designed to trick children between the approximate ages of 8 and 13 into engaging in sexually explicit activity on web cameras. The users of the websites created false profiles on popular social media websites purporting to be young children, aged from about 10 to 16. Using these false profiles, the users of the websites chatted online with actual children and lured the children victims to their websites, which appeared to allow the children to engage in private chats. Once on their websites, the users, still pretending to be young teenagers, persuaded the child victims to engage in sexually explicit activity. Unbeknownst to the victims, when they engaged in sexually explicit activity, they were secretly recorded, and those videos were shared with some members of the websites.

3. During the course of the investigation, the FBI became aware of the existence of another website, WEBSITE C. WEBSITE C operated in a similar capacity to the aforementioned websites. Specifically, on or about January 22, 2015, a law enforcement agent acting in an undercover capacity ("UC") gained access to and was able to observe the activities of WEBSITE C. The UC observed that WEBSITE C was used as a forum for users to discuss and target children to produce child pornography via web camera. The users posted links in the forum to outside websites where child victims used live web cameras. These sessions were then recorded and uploaded to an area of the

website where files were saved (the "Website Folder"). The Website Folder was a portion of WEBSITE C that allowed users to see thumbnails of the videos that depicted minors, under the age of 18, engaged in sexually explicit conduct, which law enforcement agents believed to be child pornography. The user was able to download child pornography from and upload child pornography to the Website Folder within WEBSITE C.

4. The investigation has revealed that WEBSITE C was hosted in a foreign country. Law enforcement agents determined that SOTO was the subscriber for WEBSITE C, and that SOTO listed a Bayonne, New Jersey address as the primary registration address, and an address in Branchburg, New Jersey (the "Branchburg Residence") as the secondary registration address. The IP address for WEBSITE C was registered to the Branchburg Residence.

5. On or about March 11, 2015, foreign law enforcement authorities seized WEBSITE C and terminated its registration for unlawful activity.

6. On or about April 15, 2015, law enforcement agents executed a search warrant at the Branchburg Residence. At the Branchburg Residence, law enforcement agents found a computer terminal with approximately seven monitors, six hard drives, and one computer tower, all belonging to SOTO. At the time of the search, SOTO was logged on to a website that was identical in appearance and structure to WEBSITE C. Law enforcement agents discovered a file on SOTO's computer that was titled YNDL (the "YNDL Folder"). Within the YNDL Folder, law enforcement agents found numerous child pornography videos and images. A description of three of the videos found in SOTO's YNDL Folder are as follows:

VIDEO	FILENAME	DESCRIPTION
1	vic1.rar	This video file was fourteen minutes and fifteen seconds in length and had a creation date of 12/27/2014. The file depicted a female child who appeared to be under the age of sixteen. The child exposed her vagina, masturbated and inserted an object into her vagina during the video.
2	ria.7z	This video file was seven minutes and three seconds in length and had a creation date of 01/05/2015. The file depicted a female child who appeared to be under the age of fourteen. The child exposed her vagina to the camera and masturbated.

VIDEO	FILENAME	DESCRIPTION
3	jan04k.7z	This video file was nineteen minutes and thirty seven seconds in length and had a creation date of 01/04/2015. The file depicted a female child who appeared to be under the age of fourteen. The child exposed her vagina to the camera and inserted an object into her vagina.

7. On or about April 15, 2015, law enforcement agents conducted a consensual interview with SOTO at the Branchburg Residence. After waiving his *Miranda* rights, SOTO admitted to law enforcement officers that he was the creator and administrator of WEBSITE C.

8. Based upon my education, training and experience, and my discussions with other law enforcement officers, and to the best of my knowledge, the videos described in paragraph 6 above traveled in interstate commerce and were produced using materials that were mailed and shipped and transported in and affecting interstate and foreign commerce by any means, including by computer, that is, the images were downloaded from the Internet, based upon, among other things, their presence on defendant SOTO's computer and law enforcement's knowledge that SOTO either downloaded the videos from or uploaded them to an Internet website.